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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,)	Case No:	3:19-cr-00011-HDM-CBC
)		
Plaintiff,)	INDICTMENT CHARGING	
)	VIOLATIONS OF:	
v.)		
)	Distribution of Child Pornography, in	
ADAM MICHAEL TOOMBS,)	violation of 18 U.S.C. §§ 2252A(a)(2) and	
)	(b)(1) (Count One)	
Defendant.)		
)	Receipt of Child Pornography, in violation	
)	of 18 U.S.C. §§ 2252A(a)(2) and (b)(1)	
)	(Count Two)	
)		
)	Possession of Child Pornography, in	
)	violation of 18 U.S.C. §§ 2252A(a)(5)(B)	
)	and (b)(2) (Count Three)	

THE GRAND JURY CHARGES THAT:

COUNT ONE

Distribution of Child Pornography

From on or about January 23, 2018, and continuing to on or about April 3, 2018, in
the State and Federal District of Nevada,

ADAM MICHAEL TOOMBS,

1 defendant herein, did knowingly distribute child pornography, as defined in Title 18,
2 United States Code, Section 2256(8), and material containing child pornography, that had
3 been mailed, that had been shipped and transported in and affecting interstate and foreign
4 commerce by any means including by computer, and that had been shipped and
5 transported using any means and facility of interstate and foreign commerce, in violation of
6 Title 18, United States Code, Sections 2252A(a)(2) and (b)(1).

7 **COUNT TWO**

8 **Receipt of Child Pornography**

9 Beginning at an unknown time and continuing to or about December 28, 2018, in
10 the State and Federal District of Nevada,

11 **ADAM MICHAEL TOOMBS,**

12 defendant herein, did knowingly receive child pornography, as defined in Title 18, United
13 States Code, Section 2256(8), and material containing child pornography, that had been
14 mailed, that had been shipped and transported in and affecting interstate and foreign
15 commerce by any means including by computer, and that had been shipped and
16 transported using any means and facility of interstate and foreign commerce, in violation of
17 Title 18, United States Code, Sections 2252A(a)(2) and (b)(1).

18 **COUNT THREE**

19 **Possession of Child Pornography**

20 Beginning at a time unknown, and continuing to on or about December 28, 2018,
21 in the State and Federal District of Nevada, and elsewhere,

22 **ADAM MICHAEL TOOMBS,**

23 defendant herein, did knowingly possess any book, magazine, periodical, film, videotape,
24 computer disk, and any other material that contains an image of child pornography, as

defined in Title 18, United States Code, Section 2256(8), that has been mailed, and shipped and transported using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce by any means, including by computer, and that was produced using materials that have been mailed, and shipped and transported in and affecting interstate and foreign commerce by any means, including by computer, all in violation of Title 18, United States Code, Sections 2252A(a)(5)(B) and 2252A(b)(2).

FORFEITURE ALLEGATION

Distribution of Child Pornography, Receipt of Child Pornography, and Possession of Child Pornography

1. The allegations contained in Counts One through Three of this Indictment are hereby realleged and incorporated herein by reference for the purpose of alleging forfeiture pursuant to 18 U.S.C. § 2253(a)(1) and 2253(a)(3).

2. Upon conviction of any of the felony offenses charged in Counts One through Three of this Indictment,

ADAM MICHAEL TOOMBS,

defendant herein, shall forfeit to the United States of America, any visual depiction described in 18 U.S.C. § 2252A, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped or received in violation of 18 U.S.C. § 2252A(a)(2) and 2252A(a)(5)(B);

defendant herein, shall forfeit to the United States of America, any property, real or personal, used or intended to be used to commit or to promote the commission of 18 U.S.C. § 2252A(a)(2) and 2252A(a)(5)(B) or any property traceable to such property:

1. A Dell Experian laptop, bearing serial number CQZLG1; and

1 2. A Maxtor hard drive, bearing serial number UA00D6NC, in the
2 aforementioned Dell Experian laptop;

3 All pursuant to 18 U.S.C. §§ 2252A(a)(2), 2252A(a)(5)(B), 2253(a)(1), and
4 2253(a)(3).

5 DATED: this 7th day of February, 2019.

6 A TRUE BILL:

7 15/
8 FOREPERSON OF THE GRAND JURY

9 NICHOLAS A. TRUTANICH
10 United States Attorney

11 
12 JAMES E. KELLER
13 Assistant United States Attorney